

AUSA

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

'08 MJ 8245

UNITED STATES OF AMERICA,

Plaintiff,

v.

Alfredo M. CHAVEZ Jr.

Defendant.

Magistrate Case No.:

COMPLAINT FOR VIOLATION OF

21 U.S.C. § 952 and 960

Importation of a Controlled Substance
(Felony)

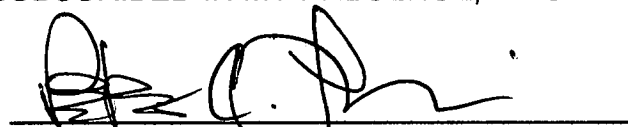
The undersigned complainant being duly sworn states:

That on or about March 18, 2008, within the Southern District of California, defendant Alfredo M. CHAVEZ Jr. did knowingly and intentionally import approximately 48.66 kilograms (107.05 pounds) of marijuana, a Schedule I Controlled Substance, into the United States from a place outside thereof, in violation of Title 21, United States Code, Sections 952 and 960.

The complainant states that this complaint is based on the attached Statement of Facts incorporated herein by reference.


BRANDON M. WOOD
Special Agent
U.S. Immigration & Customs
Enforcement

SWORN TO BEFORE ME AND SUBSCRIBED IN MY PRESENCE, THIS 18th,
DAY OF FEBRUARY 2008.


PETER C. LEWIS
UNITED STATES MAGISTRATE JUDGE

1 UNITED STATES OF AMERICA

2 v.

3 Alfredo M. CHAVEZ Jr.

4 STATEMENT OF FACTS

5 This Statement of Facts is based on the reports, documents, and notes
6 furnished to U. S. Immigration and Customs Enforcement Special Agent Brandon
7 Wood.

8 On March 18, 2008, at approximately 0105 hours, Alfredo M. CHAVEZ Jr.
9 entered the United States at the Calexico, California West Port of Entry (POE).
10 CHAVEZ was the driver and sole occupant of a 1997 Ford F-150 with California plate
11 number 5Y88701, registered to an Alfredo Chavez.

12 Customs and Border Protection Officer (CBPO) O. Hurtado was manning
13 primary lane #3 when CHAVEZ approached in his vehicle. CBPO O. Hurtado noticed
14 that CHAVEZ's vehicle had only one previous crossing. CBPO O. Hurtado noticed that
15 the gas tank and a spare tire felt solid when tapped. CBPO O. Hurtado escorted
16 CHAVEZ and his vehicle into vehicle secondary.

17 In the vehicle secondary lot, CBPO O. Hurtado requested that Customs and
18 Border Protection Canine Officer (CEO) S. Parrish utilize his Human-Narcotics Detector
19 Dog to screen the vehicle. CEO S. Parrish's HNDD alerted to the passenger side
20 interior of the vehicle. CEO S. Parrish advised CBPO O. Hurtado of the alert.

21 CBPO O. Hurtado performed an intensive inspection of the vehicle and
22 discovered forty eight (48) packages in the vehicle within a spare tire, both passenger
23 side doors, the back seat and the gas tank. CBPO O. Hurtado probed a package and a
24 green leafy substance was extracted that tested positive for marijuana. The total weight
25 of the packages was 48.66 kilograms (107.05 pounds).

26 Special Agent Wood searched the vehicle and found the registration to the
27 vehicle. The vehicle was registered in the name of Alfredo Chavez.
28
29